

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

FILED  
U.S. DISTRICT COURT  
DISTRICT OF MASS

2004 JUN 15 P 12:26

U.S. DISTRICT COURT  
DISTRICT OF MASS

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MARIAN SOCACIU  
Plaintiff

\*

C.A. NO.:

\*

\*

v.

\*

COMPLAINT

\*

\*

M/S RIVER ADAGIO and  
GRAND CIRCLE TRAVEL, INC.  
Defendants

\*

\*

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SEAMAN'S AFFIDAVIT

I, DAVID B. KAPLAN, Attorney for the plaintiff in the above-entitled action,  
on oath depose and state as follows:

The plaintiff in the above-entitled action is a seaman and claims the benefits  
of the United States Code Annotated, Title 28, Section 1916, which states that:

In all courts of the United States,  
seaman may institute and prosecute  
suits and appeals in their own names  
and for their own benefit for wages  
or salvage or the enforcement of laws  
enacted for their health or safety  
without prepaying fees or costs or  
furnishing security therefor.

Respectfully submitted,

*David B Kaplan*  
DAVID B. KAPLAN, #258540

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Dated: June 11, 2004